

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

**VERITAS HEALTH SERVICES, INC.  
d/b/a CHINO VALLEY MEDICAL  
CENTER**

**and**

**Case: 31-CA-107321**

**UNITED NURSES ASSOCIATIONS OF  
CALIFORNIA/UNION OF HEALTH CARE  
PROFESSIONALS, NUHHCE, AFSCME,  
AFL-CIO**

**RESPONDENT'S REQUEST FOR EXTENSION  
FOR FILING EXCEPTIONS AND SUPPORTING BRIEF**

Pursuant to Section 102.46 of the NLRB's Rules and Regulations, Respondent Veritas Health Services, Inc. d/b/a Chino Valley Medical Center respectfully requests that the deadline for submission of exceptions and supporting briefs in the above-referenced matter be extended by 30 days. The parties' exceptions and supporting briefs are currently due by March 31, 2015. Respondent respectfully requests that the deadline be extended to April 30, 2015.

The grounds for the request are that (1) the lead associate attorney on this matter is resigning effective March 20, 2015; (2) additional time is needed for new counsel to familiarize himself with the case; and (3) Respondent is currently in the midst of briefing in another case involving three Prime Healthcare hospitals, conflicting with the briefing schedule in this matter.

For the above reasons, Respondent respectfully requests that the deadline for submission of exceptions and supporting briefs in the above-referenced matter be extended to April 30, 2015.

Respectfully Submitted,

DLA Piper LLP (US)

/s/ Colleen Hanrahan

Colleen Hanrahan

500 Eighth Street, NW

Washington, DC 20004

202.799.4000

[joe.turzi@dlapiper.com](mailto:joe.turzi@dlapiper.com)

[colleen.hanrahan@dlapiper.com](mailto:colleen.hanrahan@dlapiper.com)

Date: March 17, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Request for Extension for Filing Exceptions and Supporting Briefs was filed electronically and sent via email to the following:

Mori P. Rubin, Regional Director  
National Labor Relations Board, Region 31  
11150 W. Olympic Boulevard, Suite 700  
Los Angeles, CA 90064  
[mori.rubin@nlrb.gov](mailto:mori.rubin@nlrb.gov)

John Rubin  
National Labor Relations Board, Region 31  
11150 W. Olympic Boulevard, Suite 700  
Los Angeles, CA 90064  
[john.rubin@nlrb.gov](mailto:john.rubin@nlrb.gov)

*Counsel for NLRB Acting General Counsel*

Lisa C. Demidovich  
United Nurses Associations of California/Union of Health Care  
Professionals, NUHHCE, AFSCME, AFL-CIO  
955 Overland Ct., Suite 150  
San Dimas, CA 91773-1740  
[lisa.demidovich@unac-ca-.org](mailto:lisa.demidovich@unac-ca-.org)

*Counsel for Charging Party*

/s/ Kevin Harlow  
An Employee of DLA Piper LLP (US)

Date: 3/17/15